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8 **UNITED STATES DISTRICT COURT**

9 **STATE OF NEVADA**

10 ELLEN REEVES,

11 Plaintiff,

12 v.

13 DISCOVER YOUR MOBILITY, INC.; SOLO  
14 WORLD PARTNERS, LLC, et al.

15 Defendants.

**Case No. 2:22-cv-01361-GMN-DJA**

**RENEWED JOINT STIPULATION  
AND ORDER FOR EXTENSION OF  
ALL DEADLINES**

**(FIFTH REQUEST)**

16 Defendant Solo World Partners, LLC (“Solo”), Plaintiff Ellen Reeves (“Plaintiff”), and  
17 Defendant Discover Your Mobility, Inc. (“Discover”) (collectively the “Parties”), by and through  
18 their respective counsel of record, hereby respectfully submit this Renewed Joint Stipulation to  
19 Extend all deadlines by an additional sixty (60) days. This is the fifth request to extend deadlines  
20 in this matter. The Parties have agreed to the extension for the reasons set forth below:

21 **PROCEDURAL BACKGROUND**

22 Plaintiff filed her Amended Complaint in this case on January 29, 2024. (ECF No. 26.)  
23 Defendant Discover Your Mobility, Inc. filed their Answer to the Amended Complaint on February  
24 12, 2024 (ECF No. 32) and Defendant Solo World Partners, LLC filed their Answer to the Amended  
25 Complaint on March 22, 2024 (ECF No. 35). On June 4, 2024, the Court issued an order granting  
26 the Renewed Discovery Plan and Scheduling Order (ECF No. 40.).

27 Since that time, the Parties, have exchanged written discovery, Plaintiff made Third  
28 Supplemental Disclosures, and Defendant Solo made its First Supplemental Disclosures.

## **REMAINING DISCOVERY**

2 All Parties are actively engaging in discovery. However, based upon recent document and  
3 witness disclosures, the parties, including Defendant Solo World Partners, LLC, which was only  
4 recently added to the lawsuit, need additional time to complete the discovery process, including  
5 evaluating and working through discovery disputes, as well as evaluating the need for taking  
6 additional depositions. The Parties will continue to ensure that relevant information is obtained and  
7 exchanged in a timely manner. The Parties anticipate taking the depositions of Plaintiff, the FRCP  
8 30(b)(6) witness for Solo World Partners, the Parties' experts, and potentially other family  
9 members of Plaintiff and other employees of Solo World Partners. Additional written discovery  
10 may be necessary depending on the parties' meet and confer efforts regarding the existence of  
11 documents and additional relevant medical records.

## **GOOD CAUSE TO EXTEND DISCOVERY**

13 The Parties have been diligent in conducting discovery in this matter so far and remain  
14 diligent in doing so.

15 The Parties have stipulated and agreed to extend all deadlines by an additional sixty (60)  
16 days as set forth below. This extension will ensure that the case continues to progress smoothly,  
17 and to allow both sides to address issues that may arise between them. For these reasons, this  
18 stipulation is made for good cause and not for any improper motive or to cause unnecessary delay.

19 The Parties hereby stipulate and agree to the following proposed deadlines in this case:

<b>Event</b>	<b>Existing Deadline</b>	<b>Proposed New Deadline</b>
Discovery Cutoff	September 17, 2024	November 18, 2024*
Dispositive Motion Deadline	October 17, 2024	December 16, 2024
Joint Proposed Pretrial Order	November 18, 2024	January 17, 2025

\* Deadline falls on a weekend, so deadline moved to the next court day.

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1        If dispositive motions are filed, the deadline for filing the joint pretrial order will be  
2 suspended until 30 days after decision on the dispositive motions or further court order.

3        **IT IS SO STIPULATED AND AGREED.**

4        DATED: this 17th day of September, 2024.

5        **DICKINSON WRIGHT PLLC**

6        **MAINOR ELLIS, LLP**

7        /s/ John L. Krieger

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11      *Attorneys for Defendant Solo World  
12      Partners, LLC*

13        /s/ Adam Ellis

14        Adam Ellis  
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18      *Attorneys for Plaintiff Ellen Reeves*

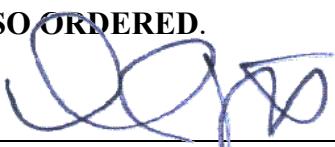
19        **HALL & EVANS, LLC**

20        /s/ Adam R. Knecht

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24      *Attorneys for Defendant Discovery Your  
25      Mobility, Inc.*

26        **IT IS SO ORDERED.**

27          
28        **UNITED STATES MAGISTRATE JUDGE**

29        DATED: 9/19/2024